

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Aug 16 2024

SC Court of Appeals

Appeal from Horry County Court of Common Pleas
Honorable Alex B. Hyman, Circuit Court Judge
Case No.: 2022-CP-26-03314

Case No.: 2024-000599

**John Strasswimmer, David Vreeland King,
and Claudia Troyer Miles,**

Respondents,

v.

Mary Michelle Miles,

Appellant.

SECOND MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF
FOR RESPONDENT DAVID VREELAND KING

AND NOW, coms Respondent, David Vreeland King, by and through his undersigned counsel, respectfully requests an extension of time to file Respondent's Initial Brief, and in support thereof avers as follows.

1. Respondent's brief is currently due on August 21, 2024.
2. The issues in the case are complex and counsel is working diligently to complete Respondent's brief. However, additional time is needed to complete the initial brief.
3. Furthermore, the Parties have been working on scheduling mediation, and are currently scheduled to participate in Mediation on November 1, 2024, in an attempt to resolve the outstanding issues in this matter and a second, related matter.

4. The undersigned counsel has discussed or communicated this Motion request with all counsel of record, who do not oppose this Motion and have consented with the understanding that the Parties will all jointly consent to a 30-day extension to the current (August) Reply Brief submission deadlines for all Respondents in this matter.

5. Accordingly, it is respectfully requested that the Court grant an additional 30-day extension of time for the filing of the initial brief of Respondent David V. King, such that the said initial brief of Respondent King shall be due on September 21, 2024.

6. This Motion is made in good faith, and is not sought for purposes of delay but so that justice may properly be served in this matter.

Accordingly, pursuant to Rule 263(b), Respondent, David Vreeland King, requests that the Court grant an additional thirty (30) days within which to file his initial brief.

Respectfully submitted,



Reese R. Boyd, III, Esq. (SC Bar# 7151)

Davis & Boyd LLC

Post Office Box 70517

Myrtle Beach, SC 29572

(843) 839-9800

(843) 839-9801 (*fax*)

reese@davisboydlaw.com

Attorneys for the Respondent David Vreeland King

Dated: August 16, 2024
Myrtle Beach, South Carolina

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Aug 16 2024

SC Court of Appeals

Appeal from Horry County Court of Common Pleas
Honorable Alex B. Hyman, Circuit Court Judge
Case No.: 2022-CP-26-03314

Case No.: 2024-000599

**John Strasswimmer, David Vreeland King,
and Claudia Troyer Miles,**

Respondents,

v.

Mary Michelle Miles,

Appellant.

PROOF OF SERVICE

I certify that on this date a copy of the foregoing **RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE BRIEF** was served on each party or counsel of record by mailing or hand delivery in the manner prescribed by the applicable Rule of Civil Procedure as follows:

By e-mail directed to the address registered with AIS:

Melody J.E . Breeden
Turner Padget
P.O. Box 2116
Myrtle Beach, SC 29578
mbreeden@turnerpadget.com

Jessica Ferguson
Turner Padget
200 E. Broad Street, Suite 250
Greenville, SC 29601
jferguson@turnerpadget.com
Attorneys for Appellant, Mary Michelle Miles

T. Jarrett Bouchette
Marissa N. Drost,
Floyd Law
P.O. Drawer 146097
Surfside Beach, SC 29587
tjbouchette@floydllaw.com
mndrost@floydllaw.com
Attorneys for Respondent, John Strasswimmer

Bess Dargan Lochocki
Waccamaw Law, LLC
P.O. Box 2307
Pawleys Island, SC 29585
bess@waccamawlawllc.com
Attorney for Respondent, Claudia Troyer Miles



Reese R. Boyd, III, Esq. (SC Bar# 7151)
Davis & Boyd LLC
Post Office Box 70517
Myrtle Beach, SC 29572
(843) 839-9800
(843) 839-9801 (fax)
reese@davisboydlaw.com

Dated: August 16, 2024
Myrtle Beach, South Carolina